

1 IN THE UNITED STATES DISTRICT COURT
2

3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 JASON GOODMAN

Case No.: 1:21-cv-10878-AT-JLC

5 Plaintiff,

6 vs.

**PLAINTIFF'S REQUEST FOR JUDICIAL
NOTICE**

7 CHRISTOPHER ELLIS BOUZY, BOT
8 SENTINEL INC., GEORGE WEBB
9 SWEIGERT

10 Defendants

11 Plaintiff Jason Goodman by and for himself pro se (“Goodman” or “Plaintiff”)
12 respectfully requests the Court take judicial notice of certain relevant new facts.
13

14 On or about June 22, 2022, an attorney purporting to represent defendants
15 Bouzy and Bot Sentinel sent a demand letter to plaintiff requesting a complete withdrawal of
16 all claims and threatening to counter sue. Plaintiff asks the Court to take judicial notice of
17 these facts and this communication. (**EXHIBIT A**)
18

19 Considering these new facts, Plaintiff respectfully seeks a waiver of service or
20 permission to serve defendants Bouzy and Bot Sentinel electronically.
21

Signed this 5th day of July 2022

Respectfully submitted,



24 Jason Goodman, Plaintiff, Pro Se
25 252 7th Avenue Apt 6s
26 New York, NY 10001
27 (323) 744-7594
28 truth@crowdsourcethetruth.org

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4 JASON GOODMAN

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6 vs.

CERTIFICATE OF SERVICE

7 CHRISTOPHER ELLIS BOUZY, BOT
8 SENTINEL INC., GEORGE WEBB
9 SWEIGERT

10 Defendants

11 It is hereby certified that plaintiff, Jason Goodman, served defendants
12 Christopher Bouzy and Bot Sentinel with a copy of the request for judicial notice on July 5,
13 2022, via his counsel Carlos Martinez via email cmartinez@scura.com and to George Webb
14 Sweigert via USPS.

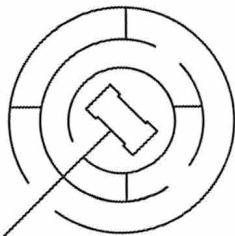
15
16 Signed this 5th day of July 2022

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27
28

(EXHIBIT A)



scura

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- ▲ ■ John J. Scura III, Esq.
David C. Wigfield, Esq.
- Christopher Heyer, Esq.
- David L. Stevens, Esq.
- Pietro Cammarota, Esq.

- Guillermo J. Gonzalez, Esq.
- ♦ Mark M. Matri, Esq.
Carlos D. Martinez, Esq.
- Jamal Romero, Esq.
- Timothy J. Bartzos, Esq.

- Roshni Shah, Esq.
- Brendan C. Greve, Esq.
- ♦ Joseph A. Hallock, Esq. (of counsel)
- Erich H. Kamm, Esq. (of counsel)

■ Certified by the Supreme Court of New Jersey
as a Civil Trial Attorney

● Also admitted in New York

▲ Also admitted in Pennsylvania

♦ Also admitted in Florida

June 21, 2022

VIA FEDEX OVERNIGHT

Multimedia System Design, Inc.
d/b/a Crowdsource The Truth
c/o Jason Goodman
252 7th Avenue - #6S
New York, NY 10001

**Re: Goodman v. Bouzy & Bot Sentinel, Inc. et als.
Civil Action No. 1:21-cv-10878-AT - Southern District of New York**

Mr. Goodman,

Please be advised that this firm represents Christopher Bouzy and Bot Sentinel, Inc., If you are represented by counsel then please direct this correspondence to the same for their review and consideration.

First, and based on my review of the docket, It seems that you've attempted to allege that my client was properly served but have failed to file a proof of service as required by Rule 4 of Civil Procedure. In addition, you've attempted to allege that my client has been evading service of process without any supporting documentation. Lastly, there has not be a waiver of service. Accordingly, and as per federal law, note that Christopher Bouzy and Bot Sentinel, Inc. have not been properly served with your complaint and summons. Until you've done so, you will not be unable to take any action against my client as the court does not have personal jurisdiction over Christopher Bouzy or Bot Sentinel, Inc.

Second, we have a strong case against you for defamation under the following allegations:

Wayne

1599 Hamburg Tpke
Wayne, NJ 07470
Mailing Address

Secaucus

1 Harmon Meadow Blvd
Suite 201
Secaucus, NJ 07094

Hackensack

3 University Plaza
Suite 207
Hackensack, NJ 07601

Newark

One Gateway Center
Suite 2600
Newark, NJ 07102



SCURA • WIGFIELD • HEYER
STEVENS • CAMMAROTA

June 22, 2022

1. You've made statements (via your own social media account or the social media of Crowdsource the Truth – including YouTube) stating that Bot Sentinel does not use algorithms to thwart disinformation on Twitter. These statements are false.
2. You've made statements (via your own social media account or the social media of Crowdsource the Truth – including YouTube) stating that Christopher Bouzy works for the Brookings Institution. These statements are false.
3. You've made statements (via your own social media account or the social media of Crowdsource the Truth – including YouTube) stating that Christopher Bouzy's mother was a prostitute from Atlantic City. These statements are false.
4. You've made statements (via your own social media account or the social media of Crowdsource the Truth – including YouTube) stating that Christopher Bouzy operates multiple social media accounts to attack you and others. These statements are false.

Since all of the statements referenced above are false, and your statements are interfering with my clients' business practices, the statements above are defamatory as a matter of law. As such, my clients are prepared to file a counterclaim against you.

In order to avoid you from incurring unnecessary legal fees, my clients have directed me to reach out to you before filing a claim against Your Company and You Personally. My clients would agree to waive any claim they have against your company and you, if you do the same. In addition, they would agree to never communicate with you, talk about you, or mention you – only if you agree to the same. At this juncture, my clients believe that this is the best course of action, but are willing and ready to take action against Your Company and You Personally if you do not agree to these terms.

If you fail to drop the lawsuit against Christopher Bouzy and Bot Sentinel, Inc., within seven (7) days from receipt of this letter, or publish additional defamatory statements in the future, my clients have instructed me to pursue such further legal actions against Your Company and You Personally, in accordance with the law, including but not limited to, all applicable civil claims and/or the filing of a criminal complaint against you. Please be guided accordingly.

Very truly yours,

A handwritten signature in black ink, appearing to read "C. Martinez".

C. Martinez, Esq.

Scura, Wigfield, Heyer, Stevens & Cammarota, LLP

Counsel for Bot Sentinel, Inc. & Christopher Bouzy

cc: Christopher Bouzy (via email)